

## Privacy Notice for Newsletter Subscribers

### I. Personal Data Controller (Controller)

Grant Thornton Legal Maślanko Kancelaria Prawna spółka komandytowa with the registered seat in Poznań, at ul. Abpa. A. Baraniaka 88 E (61-131 Poznań), entered into the Register of Entrepreneurs under KRS number 0000444633.

The Controller does not have a Data Protection Officer as it is not legally obliged to appoint one.

If you have any questions on data protection, please contact us at: [iod@pl.gt.com](mailto:iod@pl.gt.com).

### II. Purposes and legal bases of personal data processing

No.	Purpose of processing	Legal basis	Period of processing
1.	Newsletter (sending messages, studies, opinions of Grant Thornton's specialists in various fields, including law, economy, finance, cybersecurity)	Article 6(1)(a) of GDPR (consent)	Until you withdraw your consent.  Withdrawal of the consent does not affect lawfulness of processing performed prior to the withdrawal.
2.	For analytical and statistical purposes connected with assessment of effectiveness of marketing activities, which is a legitimate interest of the Personal Data Controller.	Article 6(1)(f) of GDPR (legitimate interest)	Until you submit an effective objection to processing for this purpose.
3.	Acceptance of a report and investigation of the report in accordance with the Whistleblower Protection Act	Article 6(1)(c) of GDPR (legal obligation)  <b>Regarding sensitive data:</b> Article 9(2)(g) of GDPR (substantial public interest, on the basis of EU and Polish law)	For 3 years after the end of the calendar year, in which the follow-up activities were completed, or after the completion of the proceedings initiated by these activities.  Personal data that are not relevant to the case, are not collected, and if accidentally collected, they are immediately deleted. The deletion of such personal data shall take place within 14 days after it is determined that it is not relevant to the case.

### III. Do I have to provide you with my data?

Providing the data is voluntary. If you will not provide us with your data, we will not be able to send you the newsletter.

### IV. Data recipients

We may share your personal data with: postal operators, state authorities, [companies related to the Controller](#), including entities associated within Grant Thornton International (GTI) - as part of internal administrative purposes, as well as in cases of entrusting personal data if the associated entity is a subcontractor of the Controller.

Additionally, data may be entrusted in particular to: software suppliers, entities providing us with IT services, administrative services, document destruction and archiving services, consulting services in the field of personal data protection, marketing services.

### V. Transfer of personal data to a third country

Personal data will generally not be transferred outside the European Economic Area (EEA) or made available to international organizations. If we decide to use the services of suppliers from outside the EEA, the transfer of data

will be always based on the decision of the European Commission stating the appropriate level of protection of personal data, and in the absence of such decision, the transfer takes place on the basis of standard contractual clauses adopted by the European Commission (Commission Implementing Decision (EU) 2021/ 914 of June 4, 2021 on standard contractual clauses regarding the transfer of personal data to third countries pursuant to the GDPR).

If you want a copy of standard contractual clauses or information about the security measures used in data transfer, please write to the address given in point I.

#### **VI. Catalogue of rights of data subjects**

You have the following rights:

- a. to access your personal data,
- b. to correct (rectify) the data,
- c. to have the data erased (unless the criteria provided for in Article 17(3) of GDPR are satisfied),
- d. to restrict the processing,
- e. to data portability,
- f. to file a complaint with the Personal Data Protection Office (in Poland: Prezes Urzędu Ochrony Danych Osobowych).

We would like to point out separately that you have the right to object to the processing if it is based on the so-called legitimate interest of the Controller [Article 6(1)(f) of the GDPR - see the table in point II].

#### **VII. Automated decision-making, including profiling**

The processing of personal data does not involve profiling or automated decision-making. We segment the recipients into active and inactive through monitoring of their activities (message opening, clicking the attached button, etc.).